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Attorneys for Greg Vartanian, Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**GREG VARTANIAN, on behalf  
of himself and all others similarly situated,**

## Plaintiffs

Case No. 3:12-cv-00691-EMC

**NATIONWIDE LEGAL, INC.,  
NATIONWIDE LEGAL, LLC, and  
DOES 1-100, inclusive.**

**CORRECTED JOINT STIPULATION  
AND PROPOSED ORDER TO EXTEND  
DEADLINES**

## Defendant

Plaintiff, Greg Vartanian, individually, and on behalf of putative class members (“Plaintiffs”), and Defendants, Nationwide Legal, Inc. and Nationwide Legal, LLC (“Defendants”), through their undersigned attorneys, stipulate and respectfully request that this Court approve a continuation of the status conference from July 11, 2013 to July 22, 2013; and continue the hearing on class certification from October 31, 2013 to a date convenient for the Court after November 1, 2013. As grounds for this extension, the parties state as follows:

1. On February 21, 2013 the parties filed a Notice of Stipulation and Order re  
Continuance of Mediation Completion Date (Doc. 52) requesting that (a) the mediation deadline

1 be moved to April 29, 2013; (b) the status conference be continued to May 6, 2013; and (c)  
2 continuing the deadline for Plaintiff to serve his FLSA and Rule 23 Motion for Class  
3 Certification to July 16, 2013.  
4

5 2. This Court entered an Order (Doc. 53) on February 25, 2013 (a) continuing the  
6 mediation completion date to April 29, 2013; (b) continuing the status conference to May 9,  
7 2013 at 10:30 a.m.; (c) continuing the deadline for Plaintiff to serve his FLSA 216(b) and Rule  
8 23 Class Certification Motion to July 16, 2013; and (d) continuing the hearing on class  
9 certification to August 22, 2013 at 1:30 p.m.  
10

11 3. The parties were scheduled to mediate this matter on April 24, 2013 with Carol  
12 Woodward in San Francisco.

13 4. On Sunday, April 21, 2013, Robert Camp, lead counsel for the Plaintiff, had to  
14 cancel the mediation due to his father-in-law's terminal illness, which required he and his family  
15 to assist in caring for his father-in-law. On April 25, 2013, hospice evaluated the undersigned's  
16 father-in-law and determined that he had a two to three week life expectancy. The undersigned's  
17 father-in-law passed April 29, 2013 and as such Mr. Camp was out of the office from April 21,  
18 2013 until May 5, 2013.  
19

20 5. On April 29, 2013 (Doc. 54) the undersigned, Robert Camp, working from his  
21 father-in-law's home through his staff remotely, filed a joint stipulation requesting the  
22 enlargement of certain dates as a result of his need to cancel the mediation. However, due to a  
23 misunderstanding and confusion on his part, these proposed dates were not agreed upon as  
24 represented. Based on previous communications the undersigned believed at the time he had  
25 authority from Defense Counsel to move the Court to enlarge the deadline to mediate and to  
26 avoid the parties' conflicts the first part of May. As such, Mr. Camp simply moved all deadlines  
27  
28

1 60 days to accommodate the parties' conflicts previously discussed, utilizing a previous filing as  
2 a template for the draft and did not confer again. Accordingly, Defense Counsel did not have an  
3 opportunity to review and approve the document before filing, as Mr. Camp did not provide a  
4 copy of the stipulation to Defense Counsel. Thus, Defense Counsel was unable to notify Mr.  
5 Camp before filing that the dates were unacceptable and as such, this requested correction made  
6 by the parties is not the fault of Defense Counsel.

7 6. The Court granted the stipulation on April, 29, 2013 (Doc. 55).

8 7. The evening of April 29, 2013, Defense Counsel apprised the undersigned, Robert  
9 Camp, of the misrepresentation, that the dates conflicted with her schedule and that her intent  
10 was for Plaintiff's Counsel merely to notify the Court the mediation deadline could not be met.  
11 Mr. Camp notified Defense Counsel his father-in-law had died earlier that same day and  
12 apologized stating he would correct the issue.

13 8. May 2, 2013, Defense Counsel advised that the dates set forth in the stipulation  
14 were acceptable with the exception of the dates setting the Status Conference and Hearing on  
15 Class Certification.

16 9. The undersigned Robert Camp apologizes to this Court for his failure to follow  
17 proper protocol and the additional work this correction places on the Court. Mr. Camp states this  
18 regrettable situation occurred as a result of his own oversight born out of trying to hurriedly work  
19 on this case remotely while at the same time caring for a dying loved one. Mr. Camp states this  
20 conduct is not indicative of his professionalism or practice.

21 10. As such, the parties respectfully request the previous proposed deadlines accepted  
22 by the Court regarding the Status Conference and Hearing on Class Certification be amended as  
23 follows:

1           **Status Conference: July 22, 2013**          July 25, 2013 at 10:30 a.m.

2           **Hearing on Motion for Class Certification: A date agreeable and convenient**  
3           **for the Court after November 1, 2013.**

4           11. All the undersigned have conferred and approved the filing of this stipulation.

5           12. For the above reasons, the parties request that the Court (a) continue the status  
6           25

7           conference from July 11, 2013 to July 26, 2013; and (b) continue the hearing on class  
8           November 14, 2013 at 1:30 p.m.

9           certification on October 13, 2013 to a date convenient for the Court after November 1, 2013.

10           Dated: May 6, 2013

11           Respectfully submitted,

12           **THE COCHRAN FIRM, LLC**

13           /s/ Robert J. Camp

14           **ROBERT J. CAMP**

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35           *Attorneys for Plaintiff*

36           **GREG VARTANIAN**

37           – and –

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21  
22                  *Attorneys for Defendants*  
23                  **NATIONWIDE LEGAL, INC. and**  
24                  **NATIONWIDE LEGAL, LLC**

25  
26                  IT IS SO ORDERED (AS MODIFIED ABOVE)

27  
28                  EDWARD M. CHEN  
1                  UNITED STATES DISTRICT JUDGE

